

1 **LANE & NACH, P.C.**

2 2001 East Campbell Avenue, Suite 103

3 Phoenix, Arizona 85016

4 Telephone No.: (602) 258-6000

5 Facsimile No.: (602) 258-6003

6 Adam B. Nach – 013622

7 Email: adam.nach@lane-nach.com

8 Attorneys for Stanley J. Kartchner, Trustee

9 **IN THE UNITED STATES BANKRUPTCY COURT**

10 **FOR THE DISTRICT OF ARIZONA**

11 In re:

(Chapter 7 Case)

12 RENE R. GARCIA,

No. 4:14-bk-03635-SHG

13 Debtor.

**FINAL APPLICATION FOR PAYMENT
OF ATTORNEYS' FEES AND COSTS
AND REQUEST FOR NOTICING
THROUGH TRUSTEE'S FINAL REPORT**

14 **I. GENERAL INFORMATION.**

15 Lane & Nach, P.C., (hereinafter "Attorney"), counsel for Stanley J. Kartchner, Chapter 7 Trustee
16 in the above-captioned case (hereinafter "Trustee") makes its Final Application for Payment of Attorneys'
17 Fees and Costs and *Request for Noticing Through Trustee's Final Report* ("Application"). In support of
18 its Application, Attorney submits its billing statements for the period of August 31, 2020 through March
19 21, 2022, which are attached hereto and incorporated herein. In further support of its Application, Attorney
respectfully represents as follows:

20 **II. NARRATIVE SUMMARY.**

21 **A. Background.**

22 1. This case was commenced by voluntary petition filed on or about March 18, 2014.
23 Thereafter, Stanley J. Kartchner was appointed Trustee.

24 2. Attorney's employment as counsel for the Trustee was approved by Order of this Court
25 dated August 31, 2020.

26 3. Attorney has expended in excess of 31.40 hours in its representation of the Trustee.
27 Based upon Attorney's ordinary hourly rates in effect at the time said services were rendered, Attorney's
28 total fees are \$8,136.00. In addition, Attorney has incurred out-of-pocket expenses for which it is seeking

reimbursement in the sum of \$5.40. The blended hourly rate is \$325.00. The total amount sought by Attorney is as follows:

Total Fees	\$8,136.00
Total Costs	\$5.40
Total	<u>\$8,141.40</u>

4. The services for which compensation is requested were rendered on behalf of the Trustee and compensation is sought pursuant to 11 U.S.C. §§330(a), 331 and 503(a) and (b) and Rule 2016(a), F.R.B.P. and in compliance with this Court's Order Authorizing Trustee to Employ Attorney, and the Guidelines of the Office of the U.S. Trustee for the District of Arizona.

5. Except as Attorney may be entitled to receive compensation herein, Attorney has no arrangements with any other parties whatsoever to pay Attorney for the services of Attorney to the estate, nor has Attorney received any funds from any parties whatsoever for the services rendered to the estate. Additionally, Attorney has not made any arrangements to share any compensation received by Order of this Court with any other party, nor does Attorney have arrangements for sharing of any compensation herein awarded, except as are normally divided among members and/or associates of its firm.

6. The names of all of Attorney's professionals and paraprofessionals, their billing code, and the hourly rate charged by each is set forth below. Attorney charges its non-bankruptcy clients at the same rate or higher for similar services. The rates charged are reasonable and are commensurate with fees for similar services charged by certified bankruptcy specialists and other professionals of similar experience in Phoenix, Arizona.

<i>Title</i>	<i>Name/Billing Code</i>	<i>Hourly Rate(s)</i>	<i>Year Admitted to Practice</i>
Partner	Adam B. Nach (ABN/Partner)	\$345	1991
Associate	Kris R. McDonald (KRM/Associate)	\$275	2007
Paralegal	Danica Acosta (DA/Paralegal)	\$120	N/A
Paralegal	Deb McKernan (DJM/Paralegal)	\$170	N/A

7. This Application is filed more than 120 days after the Order for relief and more than 120 days after a prior application.

B. Case Status.

1. To the best of Attorney's information and belief, the approximate amount of cash on

hand or on deposit in this bankruptcy estate is \$23,658.30.

2. Attorney is not aware of any other requests for compensation pending before this Court. To the best of Attorney's information and belief, there are no other approved and unpaid administrative expenses other than those applied for herein.

3. To the best of Attorney's information, there are no encumbered funds in the estate.

4. Trustee anticipates that the Notice of Proposed Distribution should be submitted on or before July, 2022.

C. Project Summary.

The following are the descriptions of the projects for which fees and expenses were incurred, all of which were necessary and benefited the estate, the number of hours spent and the amount of compensation requested for each professional and paraprofessional for each project.

1. Case Administration. As more fully set forth in **Exhibit "A"**, Attorney has performed professional services with respect to the general administration of this bankruptcy estate. Time was incurred in communication and correspondence with the Trustee and others regarding the general status of the case and the various activities involved in the case. Time and attention was incurred in the review of Debtor's statements and schedules filed with the Court. In connection with this subject area, Attorney expended a total of:

<i>Title</i>	<i>Name</i>	<i>Hourly Rate(s)</i>	<i>Hours</i>	<i>Dollar Amount</i>
Partner	Adam B. Nach	\$345	4.90	\$1,690.50
Associate	Kris R. McDonald	\$275	2.10	\$577.50
Paralegal	Deb McKernan	\$170	0.70	\$119.00
TOTAL				\$2,387.00

As detailed on **Exhibit "A"**, the costs for which Attorney seeks reimbursement total \$5.40.

2. Employment and Payment of Professionals. As more fully set forth in **Exhibit "A"**, Attorney has performed professional services with respect to the employment and payment of professionals. In connection with this subject area, the following fees were incurred:

<i>Title</i>	<i>Name</i>	<i>Hourly Rate(s)</i>	<i>Hours</i>	<i>Dollar Amount</i>
--------------	-------------	-----------------------	--------------	----------------------

Partner	Adam B. Nach	\$345	2.90	\$1,000.50
Associate	Kristofer McDonald	\$275	7.00	\$1,925.00
Paralegal	Danica Acosta	\$120	2.00	\$240.00
Paralegal	Deb McKernan	\$170	4.10	\$697.00
TOTAL				\$3,862.50

3. Asset Analysis and Disposition. As more fully set forth in **Exhibit "A"**, Attorney reviewed and analyzed a personal injury claim and assisted with obtaining Court approval of a settlement for the Estate pursuant to FRBP Rule 9019.. In connection with this subject area, Attorney expended a total of:

<i>Title</i>	<i>Name</i>	<i>Hourly Rate(s)</i>	<i>Hours</i>	<i>Dollar Amount</i>
Partner	Adam B. Nach	\$345	0.30	\$103.50
Associate	Kris R. McDonald	\$275	5.00	\$1,375.00
Paralegal	Deb McKernan	\$170	2.40	\$408.00
TOTAL				\$1,886.50

III. EVALUATION STANDARDS.

A. Attorney certifies that it did, in fact, perform the services set forth herein and is entitled to compensation therefor and that performance of same has benefited the estate.

B. Trustee has approved of the fees and costs sought herein.

IV. CONCLUSION.

Based on the foregoing, Lane & Nach, P.C., respectfully requests that this Court enter its Order:

A. Approving and authorizing payment of fees to Lane & Nach, P.C. in the sum of \$8,136.00, through Trustee's Final Report, for services provided herein for the period of August 31, 2020 through March 21, 2022; and,

B. Approving and authorizing reimbursement of out-of-pocket expenses to Lane & Nach, P.C., in the sum of \$5.40 incurred herein through Trustee's Final Report; and,

C. For such other and further relief as this Court deems just and proper.

RESPECTFULLY SUBMITTED this 22nd day of March, 2022.

LANE & NACH, P.C.

By /s/ Adam B. Nach – 013622
Adam B. Nach
Attorneys for Trustee

1 Copy of the foregoing delivered
2 via electronic Court notification to:

3 Kenneth L. Neeley
4 Neeley Law Firm, PLC
5 1120 S. Dobson Rd., Ste. 230
6 Chandler, AZ 85286
7 Email: ecf@neeleylaw.com

8 Office of U.S. Trustee
9 230 North First Avenue
10 Phoenix, AZ 85003
11 Email: Renee.S.Shamblin@usdoj.gov
12 Email: ustpreion14.px.ecf@usdoj.gov

13 By /s/ Danica Acosta
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT “A”

		<u>Hours to Bill</u>	<u>Amount</u>	
Subtotal for Timekeeper 2	Billable	4.90	1,690.50	ADAM B. NACH
Subtotal for Timekeeper 14	Billable	2.10	577.50	KRISTOFER R. MCDONALD
Subtotal for Timekeeper 16	Billable	0.70	119.00	DEB MCKERNAN
Total for Category 101	Billable	7.70	2,387.00	CASE ADMINISTRATION
Subtotal for Timekeeper 2	Billable	2.90	1,000.50	ADAM B. NACH
Subtotal for Timekeeper 12	Billable	2.00	240.00	DANICA ACOSTA
Subtotal for Timekeeper 14	Billable	7.00	1,925.00	KRISTOFER R. MCDONALD
Subtotal for Timekeeper 16	Billable	4.10	697.00	DEB MCKERNAN
Total for Category 102	Billable	16.00	3,862.50	PROFESSIONAL EMPLOYMENT/ FEES
Subtotal for Timekeeper 2	Billable	0.30	103.50	ADAM B. NACH
Subtotal for Timekeeper 14	Billable	5.00	1,375.00	KRISTOFER R. MCDONALD
Subtotal for Timekeeper 16	Billable	2.40	408.00	DEB MCKERNAN
Total for Category 104	Billable	7.70	1,886.50	ASSET ANALYSIS & DISPOSITION
GRAND TOTALS				
	Billable	31.40	8,136.00	

LANE & NACH, P.C.

2001 E. Campbell Avenue

Suite 103

PHOENIX, AZ 85016

Telephone: (602) 258-6000

Facsimile (602) 258-6003

TAX I.D. #86-0938074

STANLEY KARTCHNER
7090 N. ORACLE RD #178-204
TUCSON, AZ 85704

Statement Date: March 21, 2022
Statement No. 96808
Account No. 11012.748

Page: 1

RE: GARCIA, RENE

Fees

			Rate	Hours	
08/28/2020	ABN	REVIEW AND RESPOND TO E-MAIL WITH ATTORNEY FOR DEBTOR REGARDING PI; REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING PI ACTION; ATTENTION TO NEW CASE ISSUES.	345.00	0.30	103.50
08/31/2020	KRM	REVIEW FILE, SCHEDULES, DOCKET; EVALUATE AND ASSESS ISSUES IN THE CASE.	275.00	0.50	137.50
09/01/2020	ABN	REVIEW NOTICE OF CLAIMS BAR DATE.	345.00	0.10	34.50
09/21/2020	ABN	REVIEW FILE; CASE STATUS REPORT TO TRUSTEE.	345.00	0.30	103.50
12/21/2020	ABN	REVIEW FILE; CASE STATUS REPORT TO TRUSTEE.	345.00	0.30	103.50
02/17/2021	ABN	REVIEW FILE; CASE STATUS REPORT TO TRUSTEE.	345.00	0.20	69.00
05/20/2021	ABN	REVIEW FILE; CASE STATUS REPORT TO TRUSTEE.	345.00	0.20	69.00
06/30/2021	ABN	REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING SETTLEMENT.	345.00	0.20	69.00
07/02/2021	ABN	REVIEW AND EXECUTE 9019 AND NOTICE OF OF THE 9019.	345.00	0.20	69.00
07/19/2021	KRM	EDIT, REVIEW, REVISE DRAFT LETTER TO CREDITORS REGARDING CASE ADMINISTRATION AND PROOFS OF CLAIM.	275.00	0.30	82.50
10/19/2021	ABN	REVIEW FILE; CASE STATUS REPORT TO TRUSTEE.	345.00	0.20	69.00
01/11/2022	ABN	REVIEW AND ANALYZE FILE; CLOSING MEMORANDUM TO TRUSTEE.	345.00	0.80	276.00
	ABN	REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING ABANDONMENT OF PROCEEDS.	345.00	0.20	69.00

			Rate	Hours	
01/27/2022	KRM	ANALYZE ISSUE REGARDING CASE CLOSURE BASED ON DIFFERENCE BETWEEN AMOUNTS ON HAND AND GROSS SETTLEMENT AMOUNT IN 9019 ORDER.	275.00	0.30	82.50
01/28/2022	KRM	REVIEW AND ANALYZE FILE REGARDING ABANDONMENT OF PROPERTY.	275.00	0.40	110.00
	KRM	DRAFT NOTICE OF ABANDONMENT OF BALANCE OF NET SETTLEMENT PROCEEDS.	275.00	0.30	82.50
	ABN	REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING ABANDONMENT.	345.00	0.10	34.50
01/31/2022	ABN	REVIEW, REVISE AND EDIT ABANDONMENT NOTICE; REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING SAME.	345.00	0.20	69.00
	ABN	REVIEW FILE; REVIEW EMAILS; EVALUATE CHANGES TO ABANDONMENT; TELEPHONE CONFERENCE WITH TRUSTEE REGARDING ABANDONMENT; REVIEW, REVISE AND EDIT ABANDONMENT PER TRUSTEE.	345.00	0.60	207.00
02/01/2022	DJM	FINALIZE AND FILE NOTICE OF TRUSTEE'S INTENT TO ABANDON PROPERTY; SERVE COPIES OF THE SAME VIA EMAIL.	170.00	0.20	34.00
	ABN	REVIEW AND EXECUTE NOTICE OF ABANDONMENT.	345.00	0.10	34.50
02/04/2022	ABN	REVIEW BNC CERTIFICATE OF SERVICE REGARDING ABANDONMENT.	345.00	0.10	34.50
	DJM	DOWNLOAD AND SAVE BNC; CALENDAR DEADLINE TO OBJECT TO NOTICE OF TRUSTEE'S INTENT TO ABANDON PROPERTY.	170.00	0.10	17.00
02/22/2022	KRM	EDIT, REVIEW, REVISE DRAFT CERTIFICATE OF NO OBJECTION AND ORDER APPROVING ABANDONMENT.	275.00	0.30	82.50
02/23/2022	DJM	REVIEW COURT DOCKET FOR OBJECTIONS; PREPARE CERTIFICATE OF NO OBJECTION AND PROPOSED ABANDONMENT ORDER.	170.00	0.40	68.00
03/21/2022	ABN	ATTENTION TO CLOSING CASE ISSUES.	345.00	0.80	276.00
		CASE ADMINISTRATION		7.70	2,387.00
08/31/2020	DLA	REVIEW FILE FOR CONFLICTS; PREPARATION OF APPLICATION TO EMPLOY ATTORNEY FOR TRUSTEE, ATTORNEY DISINTERESTEDNESS DECLARATION AND FORM OF ORDER; ELECTRONIC COURT FILING.	120.00	1.00	120.00
	KRM	EMAIL CORRESPONDENCE WITH DEBTOR'S COUNSEL REGARDING EMPLOYMENT IN THE CASE.	275.00	0.10	27.50
	ABN	REVIEW APPLICATION TO EMPLOY AND ORDER; REVIEW FILE FOR CONFLICTS.	345.00	0.40	138.00
09/02/2020	KRM	DRAFT EMAIL TO PROSPECTIVE SPECIAL COUNSEL REGARDING THE BANKRUPTCY AND THE PROCEDURES FOR EMPLOYMENT OF SPECIAL COUNSEL AND OBTAINING COURT APPROVAL FOR THE SETTLEMENT.	275.00	0.30	82.50

GARCIA, RENE

			Rate	Hours	
09/09/2020	KRM	REVIEW AND RESPOND TO EMAIL FROM SPECIAL COUNSEL REGARDING EMPLOYMENT AND FEE SPLIT.	275.00	0.20	55.00
	KRM	TELEPHONE CONFERENCE WITH SPECIAL COUNSEL REGARDING EMPLOYMENT OF ADDITIONAL FIRMS.	275.00	0.20	55.00
09/17/2020	KRM	REVIEW CORRESPONDENCE, DRAFT EMAIL TO SPECIAL COUNSEL REGARDING STATUS OF EMPLOYMENT DOCUMENTS.	275.00	0.20	55.00
09/23/2020	KRM	REVIEW FILE, CONTINUE TO STRATEGIZE REGARDING EMPLOYMENT OF SPECIAL COUNSEL IN LIGHT OF INFORMATION PROVIDED REGARDING PLAINTIFF'S STEERING COMMITTEE.	275.00	0.40	110.00
	DJM	DRAFT TRUSTEE'S APPLICATION TO EMPLOY SPECIAL COUNSEL ON A CONTINGENCY FEE BASIS	170.00	1.20	204.00
	KRM	BEGIN TO EDIT, REVIEW, REVISE DRAFT APPLICATION TO EMPLOY SPECIAL COUNSEL.	275.00	0.40	110.00
09/25/2020	DJM	DRAFT DECLARATIONS OF SPECIAL COUNSEL FOR ATTORNEY REVIEW AND REVISION.	170.00	0.50	85.00
	KRM	EDIT, REVIEW, REVISE DECLARATIONS OF SPECIAL COUNSEL AND STRATEGIZE REGARDING EMPLOYMENT.	275.00	0.30	82.50
	DJM	PREPARE PROPOSED ORDER APPROVING TRUSTEE'S APPLICATION TO EMPLOY SPECIAL COUNSEL ON A CONTINGENCY FEE BASIS.	170.00	0.30	51.00
	KRM	EDIT, REVIEW, REVISE ORDER REGARDING SPECIAL COUNSEL.	275.00	0.20	55.00
09/28/2020	KRM	REVIEW AND RESPOND TO EMAIL FROM SPECIAL COUNSEL REGARDING CORRECTIONS AS TO PROPOSED FEE SPLIT AND FIRMS TO EMPLOY.	275.00	0.30	82.50
	DJM	REVIEW SPECIAL COUNSEL'S EMAIL AND REVISION TRUSTEE'S APPLICATION TO EMPLOY SPECIAL COUNSEL ON A CONTINGENCY FEE BASIS; DECLARATIONS SPECIAL COUNSEL; DECLARATIONS AND PROPOSED FORM OF ORDER.	170.00	0.40	68.00
	KRM	EDIT, REVIEW, REVISE DRAFT APPLICATION TO EMPLOY SPECIAL COUNSEL, DECLARATIONS, AND PROPOSED ORDER, IN LIGHT OF NEW INFORMATION PROVIDED BY JEFFREY GLASSMAN, LLC.	275.00	0.30	82.50
10/09/2020	KRM	DRAFT MEMORANDUM TO FILE REGARDING EMPLOYMENT OF SPECIAL COUNSEL.	275.00	0.30	82.50
	ABN	REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING EMPLOYMENT OF SPECIAL COUNSEL.	345.00	0.20	69.00
10/13/2020	KRM	DRAFT EMAIL TO SPECIAL COUNSEL REGARDING DRAFT APPLICATION TO EMPLOY AND NEXT STEPS.	275.00	0.20	55.00
10/21/2020	KRM	RECEIPT AND REVIEW OF SIGNED SPECIAL COUNSEL DECLARATIONS, FINALIZE DRAFT APPLICATION TO EMPLOY AND PROPOSED ORDER.	275.00	0.30	82.50

GARCIA, RENE

			Rate	Hours	
	DJM	FINALIZE AND FILE TRUSTEE'S APPLICATION TO EMPLOY SPECIAL COUNSEL ON A CONTINGENCY FEE BASIS AND DECLARATIONS SPECIAL COUNSEL; LODGE PROPOSED FORM OF ORDER; FILE NOTICE OF LODGING PROPOSED ORDER.	170.00	0.30	51.00
	ABN	REVIEW AND EXECUTE APPLICATION TO EMPLOY SPECIAL COUNSEL.	345.00	0.10	34.50
10/22/2020	KRM	REVIEW ORDER APPROVING EMPLOYMENT OF SPECIAL COUNSEL AND EMAIL SAME TO SPECIAL COUNSEL ALONG WITH EXPLANATION OF THE NEXT STEPS.	275.00	0.20	55.00
11/04/2020	KRM	REVIEW AND RESPOND TO EMAIL FROM SPECIAL COUNSEL REGARDING DEBTOR'S OBJECTION TO EMPLOYMENT.	275.00	0.20	55.00
	KRM	RECEIPT AND REVIEW OF DEBTOR'S OBJECTION TO EMPLOYMENT OF SPECIAL COUNSEL.	275.00	0.40	110.00
11/05/2020	KRM	TELEPHONE CALL FROM DEBTOR'S COUNSEL REGARDING PENDING OBJECTION.	275.00	0.20	55.00
	KRM	EMAIL CORRESPONDENCE WITH SPECIAL COUNSEL REGARDING PENDING OBJECTION TO EMPLOYMENT.	275.00	0.20	55.00
11/06/2020	KRM	TELEPHONE CALL FROM SPECIAL COUNSEL REGARDING DEBTOR'S PENDING OBJECTION TO EMPLOYMENT AND STATUS OF RELATED CASE LAW.	275.00	0.20	55.00
11/17/2020	KRM	RECEIPT AND REVIEW OF ORDER TO SHOW CAUSE REGARDING DEBTOR'S MOTION FOR RECONSIDERATION.	275.00	0.20	55.00
	KRM	DRAFT EMAIL TO DEBTOR'S COUNSEL REGARDING ORDER TO SHOW CAUSE.	275.00	0.10	27.50
	KRM	EMAIL CORRESPONDENCE WITH SPECIAL COUNSEL REGARDING ORDER TO SHOW CAUSE.	275.00	0.10	27.50
	ABN	REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING ORDER TO SHOW CAUSE AND SPECIAL COUNSEL.	345.00	0.20	69.00
11/24/2020	DJM	PREPARE STIPULATION TO EXTEND THE DEADLINE FOR TRUSTEE TO FILE A RESPONSE TO DEBTOR'S MOTION TO RECONSIDER AND PROPOSED FORM OF ORDER.	170.00	0.50	85.00
	KRM	EDIT, REVIEW, REVISE DRAFT STIPULATION TO EXTEND TRUSTEE'S ANSWERING DEADLINE AND PROPOSED ORDER IN SUPPORT.	275.00	0.40	110.00
11/25/2020	DJM	FINALIZE AND FILE STIPULATION TO EXTEND THE DEADLINE FOR TRUSTEE TO FILE A RESPONSE TO DEBTOR'S MOTION TO RECONSIDER, AS SET FORTH IN THE COURT'S ORDER TO SHOW CAUSE DATED NOVEMBER 16, 2020 [DKT. 31]; LODGE PROPOSED FORM OF ORDER; FILE NOTICE OF LODGING PROPOSED ORDER.	170.00	0.20	34.00
	ABN	REVIEW AND EXECUTE STIPULATION TO EXTEND TIME TO RESPOND TO MOTION TO RECONSIDER.	345.00	0.10	34.50

GARCIA, RENE

			Rate	Hours	
12/21/2020	KRM	DRAFT EMAIL TO DEBTOR'S COUNSEL REGARDING RESOLUTION OF DISPUTE WITH SPECIAL COUNSEL.	275.00	0.20	55.00
01/21/2021	DJM	PREPARE SECOND STIPULATION TO EXTEND THE DEADLINE FOR TRUSTEE TO FILE A RESPONSE TO DEBTOR'S MOTION TO RECONSIDER AND PROPOSED FORM OF ORDER.	170.00	0.30	51.00
	KRM	EDIT, REVIEW, REVISE DRAFT SECOND STIPULATION TO EXTEND ANSWERING DEADLINE TO ORDER TO SHOW CAUSE AND FORM OF ORDER.	275.00	0.20	55.00
	KRM	DRAFT EMAIL TO DEBTOR'S COUNSEL REGARDING REGARDING DRAFT STIPLUATION.	275.00	0.20	55.00
01/22/2021	DJM	FINALIZE AND FILE SECOND STIPULATION TO EXTEND THE DEADLINE FOR TRUSTEE TO FILE A RESPONSE TO DEBTOR'S MOTION TO RECONSIDER; LODGE PROPOSED FORM OF ORDER; FILE NOTICE OF LODGING PROPOSED ORDER.	170.00	0.20	34.00
	ABN	REVIEW AND EXECUTE 2ND STIPULATION.	345.00	0.10	34.50
01/25/2021	DJM	DOWNLOAD AND SAVE SIGNED ORDER APPROVING STIPULATION TO EXTEND THE DEADLINE FOR TRUSTEE TO FILE A RESPONSE; CALENDAR DEADLINE TO FILE A RESPONSE.	170.00	0.20	34.00
02/23/2021	KRM	RECEIPT AND REVIEW OF DRAFT 9019 MOTION.	275.00	0.30	82.50
	KRM	DRAFT MEMORANDUM TO FILE REGARDING PROPOSE 9019 TERMS.	275.00	0.20	55.00
03/01/2021	ABN	REVIEW AND ANALYZE DEBTOR'S AGREEMENT WITH SPECIAL COUNSEL; REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING SAME.	345.00	0.30	103.50
03/02/2021	ABN	REVIEW AND RESPOND TO E-MAIL WITH TRUSTEE REGARDING AGREEMENT BETWEEN DEBTOR AND SPECIAL COUNSEL.	345.00	0.20	69.00
03/08/2021	ABN	REVIEW FILED 9019 WITH DEBTOR AND SPECIAL COUNSEL; REVIEW NOTICE.	345.00	0.30	103.50
06/07/2021	ABN	REVIEW ORDER GRANTING DEBTOR'S 9019.	345.00	0.10	34.50
03/21/2022	DLA	FINALIZE TRUSTEE ATTORNEY FEE APPLICATION AND RELATED DOCUMENTS.	120.00	1.00	120.00
	ABN	REVIEW, REVISE AND EDIT INVOICES TO COMPLY WITH UST GUIDELINES; REVIEW, REVISE AND EDIT FEE APPLICATION.	345.00	0.90	310.50
		PROFESSIONAL EMPLOYMENT/ FEES		16.00	3,862.50
03/02/2021	KRM	EMAIL CORRESPONDENCE WITH DEBTOR'S COUNSEL REGARDING 9019 DRAFT.	275.00	0.20	55.00

GARCIA, RENE

			Rate	Hours	
04/19/2021	KRM	REVIEW AND RESPOND TO EMAIL FROM SPECIAL COUNSEL REGARDING MEDICAL LIENS.	275.00	0.20	55.00
06/07/2021	KRM	DRAFT EMAIL TO SPECIAL COUNSEL REGARDING STATUS OF INJURY CLAIM IN LIGHT OF APPROVAL OF SETTLEMENT REGARDING ATTORNEY FEES AND COSTS.	275.00	0.20	55.00
06/14/2021	KRM	REVIEW AND RESPOND TO EMAIL FROM SPECIAL COUNSEL REGARDING STATUS OF SETTLEMENT OF PAYMENT.	275.00	0.20	55.00
06/21/2021	KRM	DRAFT EMAIL TO SPECIAL COUNSEL REQUESTING UPDATED SETTLEMENT STATEMENT.	275.00	0.20	55.00
06/22/2021	KRM	DRAFT MEMORANDUM TO FILE REGARDING TERMS OF SETTLEMENT.	275.00	0.30	82.50
06/30/2021	DJM	BEGIN DRAFT OF TRUSTEE'S MOTION TO COMPROMISE A CLAIM OF THE ESTATE AND COMPENSATE SPECIAL COUNSEL ON A CONTINGENCY FEE BASIS.	170.00	1.10	187.00
	KRM	ASSESS ISSUE REGARDING POTENTIAL PAYMENT OF MDL FEE.	275.00	0.20	55.00
07/01/2021	KRM	EDIT, REVIEW, REVISE DRAFT 9019 MOTION.	275.00	0.50	137.50
	DJM	PREPARE NOTICE OF TRUSTEE'S MOTION TO COMPROMISE A CLAIM OF THE ESTATE AND COMPENSATE SPECIAL COUNSEL ON A CONTINGENCY FEE BASIS.	170.00	0.30	51.00
	KRM	EDIT, REVIEW, REVISE DRAFT NOTICE OF 9019 MOTION.	275.00	0.30	82.50
	KRM	REVIEW FILE REGARDING DRAFTING 9019.	275.00	0.40	110.00
07/02/2021	DJM	FINALIZE AND FILE TRUSTEE'S MOTION TO COMPROMISE A CLAIM OF THE ESTATE AND COMPENSATE SPECIAL COUNSEL ON A CONTINGENCY FEE BASIS AND NOTICE OF BAR DATE.	170.00	0.20	34.00
07/05/2021	ABN	REVIEW BNC CERTIFICATE OF SERVICE REGARDING 9019.	345.00	0.10	34.50
07/06/2021	DJM	DOWNLOAD AND SAVE BNC; CALENDAR DEADLINE TO OBJECT TO TRUSTEE'S MOTION TO COMPROMISE A CLAIM OF THE ESTATE AND COMPENSATE SPECIAL COUNSEL ON A CONTINGENCY FEE BASIS.	170.00	0.10	17.00
08/09/2021	DJM	PREPARE CERTIFICATE OF NO OBJECTION AND PROPOSED ORDER APPROVING TRUSTEE'S MOTION TO COMPROMISE A CLAIM OF THE ESTATE AND COMPENSATE SPECIAL COUNSEL ON A CONTINGENCY FEE BASIS	170.00	0.50	85.00

GARCIA, RENE

			Rate	Hours	
08/10/2021	KRM	EDIT, REVIEW, REVISE DRAFT CERTIFICATE OF NO OBJECTION AND ORDER APPROVING 9019 MOTION.	275.00	0.40	110.00
08/11/2021	DJM	FINALIZE AND FILE CERTIFICATE OF NO OBJECTION; LODGE PROPOSED ORDER APPROVING TRUSTEE'S MOTION TO COMPROMISE A CLAIM OF THE ESTATE AND COMPENSATE SPECIAL COUNSEL ON A CONTINGENCY FEE BASIS; FILE NOTICE OF LODGING PROPOSED ORDER.	170.00	0.20	34.00
	ABN	REVIEW AND EXECUTE CERTIFICATE OF NO OBJECTION; REVIEW AND EXECUTE LODGING JUDGMENT.	345.00	0.20	69.00
08/16/2021	KRM	DRAFT EMAIL TO SPECIAL COUNSEL REGARDING APPROVAL OF SETTLEMENT AND PAYMENT INSTRUCTIONS.	275.00	0.20	55.00
09/15/2021	KRM	REVIEW FILE, EVALUATE AND ASSESS STATUS OF RELEASE OF SETTLEMENT FUNDS.	275.00	0.20	55.00
10/15/2021	KRM	EMAIL CORRESPONDENCE WITH SPECIAL COUNSEL REGARDING STATUS OF SETTLEMENT FUNDS AND RELEASE.	275.00	0.20	55.00
01/03/2022	KRM	REVIEW AND RESPOND TO EMAIL FROM SPECIAL COUNSEL REGARDING STATUS OF DISTRIBUTION OF PROCEEDS.	275.00	0.20	55.00
01/10/2022	KRM	REVIEW 9019 ORDER AND EMAIL FROM SPECIAL COUNSEL; ANALYZE ISSUE REGARDING CHANGE IN LIEN AMOUNTS, EXPENSES AND MDL FEE.	275.00	0.40	110.00
01/11/2022	KRM	DRAFT MEMORANDUM TO FILE REGARDING POTENTIAL AMENDMENT OF 9019 ORDER AND PROPOSED PARTIAL DISTRIBUTION.	275.00	0.30	82.50
01/13/2022	KRM	DRAFT EMAIL TO SPECIAL COUNSEL REGARDING PARTIAL DISTRIBUTION.	275.00	0.20	55.00
01/20/2022	KRM	REVIEW AND RESPOND TO EMAIL FROM SPECIAL COUNSEL REGARDING ISSUANCE OF CHECK.	275.00	0.20	55.00
		ASSET ANALYSIS & DISPOSITION		7.70	1,886.50
		For Current Services Rendered		31.40	8,136.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
ADAM B. NACH	8.10	\$345.00	\$2,794.50
DANICA ACOSTA	2.00	120.00	240.00
KRISTOFER R. MCDONALD	14.10	275.00	3,877.50
DEB MCKERNAN	7.20	170.00	1,224.00

STANLEY KARTCHNER

GARCIA, RENE

Page: 8

03/21/2022

Account No: 11012-748

Statement No: 96808

Expenses

03/16/2022	PACER FEE	5.40
	Total Expenses	5.40
	Total Current Work	8,141.40
	Balance Due	<u>\$8,141.40</u>